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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

Edwin Takeuchi,

Debtor.

Case No. 09-18781 mkn

CHAPTER 13

Hearing Date: December 30, 2009

Hearing Time: 10:30 a.m.

Courtroom: 2

**OPPOSITION TO MOTION FOR RELIEF FROM STAY FILED BY DEUTSCHE  
BANK NATIONAL TRUST COMPANY**

TO: THE HONORABLE CHIEF U.S. BANKRUPTCY JUDGE MIKE NAKAGAWA:

Page 1

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2  
3 EDWIN TAKEUCHI, the Debtor in the above-captioned bankruptcy proceeding, by and  
4 through his attorney, COLEMAN LAW OFFICES P.C., hereby opposes Motion for Relief from  
5 Automatic Stay filed by DEUTSCHE BANK NATIONAL TRUST COMPANY., filed on  
6 December 4, 2009 concerning the property located at 6020 Starpoint Court, North Las Vegas, NV  
7 89081 (**"Property"**).  
8

9 **ADEQUATE PROTECTION**

10 1. Relief from the stay is not justified because the Debtor is ready and willing to provide  
11 adequate protection to the Noteholder for payments that have been missed. Debtor requests an  
12 Adequate Protection agreement from Creditor's attorney. Once Debtor has some clarification of  
13 the exact amounts owing to the Creditor, Debtor will be ready and willing to resume payments on  
14 this Property based on such an Adequate Protection Order. Debtor anticipates then remaining  
15 current on this property in the months to come.  
16

17 2. Debtor will be retaining the Property, and Debtor will make payments in the future as  
18 required to come current.  
19

20 **WHEREFORE**, Debtors pray judgment and orders as follows:

21 1. Motion for Relief from Stay filed by DEUTSCHE BANK NATIONAL TRUST  
22 COMPANY be denied;

23 2. In the alternative, said Motion for Relief from Stay be continued until such a time  
24 as the Debtor and moving creditor can work out and submit an Adequate Payment Order to the  
25 Court.  
26

27 3. For such other and further relief as the Court deems just and proper.  
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Page 2

1 DATED this 14<sup>th</sup> day of December, 2009.

2 Submitted by:

COLEMAN LAW ASSOCIATES, APLC

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5 By: /s/ Elizabeth DeFlyer

ELIZABETH DEFLYER, ESQ.

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9 Attorney for Debtor  
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